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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Case No. 3:05-cv-00273-JWS

CERTIFICATION OF READINESS FOR TRIAL

16 Comes now, Isaac D. Zorea, counsel for plaintiff Carolyn Mitchell, acting
17 pursuant to court order, docket 87, to provide the following Certification of
18 Readiness for Trial.

Having consulted with defendants' counsel, Joyce Weaver Johnson, it has
been decided that discovery is complete. However, Ms. Weaver has stated her
desire, and intent, to file with this court a dispositive motion concerning issues of
defendants' immunity. Ms. Weaver has requested an April 15, 2008 deadline for
filing her dispositive motion on this matter.

23 Counsel for plaintiff ardently oppose any further dispositive motions in this

28 CERTIFICATION OF READINESS FOR TRIAL:
MITCHELL v. MOA, POLICE DEPARTMENT, ET AL.

1 case. Plaintiff's counsels argue that it has been over a year since the deadline for
2 dispositive motions has passed. Plaintiff's counsels believe that permitting
3 additional dispositive motions at this date unjustly prejudices her case by stretching
4 out the pretrial deadlines beyond normal time periods. If defendants had issues of
5 immunity they should have filed these along with the motions for summary
6 judgment.

7 Consequently, counsels for defendant and plaintiff are in disagreement
8 concerning whether any matters remain for this court to address prior to trial. As
9 such, the parties request a status conference with this court wherein these remaining
10 issues can be addressed, and resolved.

11
12 Respectfully submitted this 24th day of March 2008.

13
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1
2 Certificate of Service

3 I hereby certify that on March 24, 2008
4 I electronically filed the foregoing with
5 the Clerk of Court using the CM/ECF
6 system which sent notification to the
7 following:

8 Joyce Weaver Johnson

9 and I hereby certify that I have mailed by
10 United States Postal Service the document
11 to the following non CM/ECF participants:

12 none.

13 Dated this 24th day of March 2008, at Anchorage, Alaska.

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